

REMARKS

1. *Status of the Application.* Claims 1-25 are pending in the application. In the Office Action, claims 1-5 and 13-15 were rejected under 35 U.S.C. § 103, while claims 6-12 and 16-25 were merely objected to as being dependent upon rejected base claim(s) and deemed otherwise allowable if amended to include all of the limitation sof the base claim and any intervening claims.

Claim 1 is amended herein. No new matter is added by way of this amendment.

2. *The Section 103 Rejections.* Claims 1-5 and 13-15 were rejected under 35 U.S.C. § 103 as being unpatentable over U.S. Patent No. 4,473,304 to Ketner ("Ketner") in view of U.S. Patent No. 3,029,592 to Bandi ("Bandi").

Firstly, it is to be noted that claim 1 as amended herein essentially takes up the content of claims 1 and 2 prior to amendment and specifies that the work train comprises a first mobile provided with a pin on which the motion work mobile is friction-mounted.

It is to be noted, first of all, that in the movements of a traditional-type mechanical watch, the hour and minute display is realized by a so-called motion work system, as would be apparent to anyone of ordinary skill in the art.

On the other hand, in accordance with the present invention, the motion work consists of a cannon pinion carrying the minute-hand. The cannon pinion is driven by the work train, level with the center wheel with which it is coaxial and connected by

friction. The cannon pinion drives a motion work, bearing a motion work pinion which cooperates with an hour wheel, coaxial with the cannon pinion, bearing the hour-hand.

Ketner discloses few elements concerning the practical realization of a watch movement comprising an opening in its center. Only the embodiment illustrated in figure 5 of *Ketner* reveals that the display means are driven by means of long gear trains disposed in the annular part of the frame and at least partially in the horns of the watch case. These gear trains replace the motion work system as set out above.

Such gear trains are disadvantageous from the point of view of the energy efficiency of the movement, but are necessary, in electromechanical or mechanical versions of this type of movement of the prior art, to allow for variations in ratio of the diameters of the mobiles carrying the minute- and hour-hands.

The subject of claim 1, on the other hand, is therefore patentably distinct from the teachings of *Ketner*, inasmuch as *Ketner* neither discloses nor suggests the fact that the motion work mobile is coaxial with the first wheel.

Although *Bandi* apparently discloses certain parts of a mechanical watch movement which are absent from *Ketner*, *Bandi*, just like *Ketner*, does not comprise a motion work system such as disclosed and claimed in the present application. Indeed, the demultiplication between the train driving the hour-hand and that driving the minute-hand is realized by a differential, the latter being connected to the work train through its second entrance by means of friction. Thus, the person skilled in the art would have no motivation to make the proposed hypothetical combination of *Ketner* and *Bandi*. Even if

such hypothetica combination were made, this would not achieve the structure and associated benefits of the invention as disclosed and claimed in the present application.

Moreover, even with the aid of technical knowledge, a person skilled in the art could not directly apply the principle of a traditional-type motion work to the teaching of *Ketner*, for not only is *Ketner* silent as to the manner in which a mechanical watch movement is arranged, but, more importantly, a person skilled in the art cannot arrange the cannon pinion coaxially with the great wheel (also referred to as the center wheel when it is situated in the center of the movement), since such a construction would not allow a display to be obtained which revolves around a central opening.

On the other hand, it is precisely due to the structure disclosed and claimed in the present application that the center of the watch, normally occupied by the hands-drive and by the center wheel directly driving the cannon pinion, finds itself unoccupied. Moreover, this construction allows the hour wheel and the cannon pinion to be driven by means of a motion work system similar to those in existence, thus allowing the pattern of growth in the size of the central opening in the frame to be easily broken.

In view of the clear distinctions between the present invention and the prior art, including both *Ketner* and *Bandi*, as well as the proposed hypothetical combination thereof, it is respectfully submitted that the rejection under § 103 finds no support and cannot stand. Reconsideration and withdrawal of the § 103 rejection is therefore respectfully requested.

CONCLUSION

In view of the foregoing amendments and remarks, Assignee respectfully submits that each of the claims now pending in the application is allowable, and that the application as a whole is in proper form and condition for allowance. If the Examiner believes that the application can be placed in even better condition for allowance, she is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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